## KARAGANIS & WHITE LTD.

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October 14, 1994

## **VIA CERTIFIED MAIL** RETURN RECEIPT REQUESTED

Ms. Linda Beasley **Enforcement Specialist** U.S.E.P.A - Region 5 **Emergency Support Section HSE-5J** 77 West Jackson Boulevard Chicago, Illinois 60604-3590

> RE: Conservation Chemical Company of Illinois, Inc. Site Gary, Indiana

Dear Ms. Beasley:

JOSEPH V. KARAGANIS

BARBARA ANNE MAGEL

A. BRUCE WHITE

MARK D. ERZEN JOHN W. KALICH JANICE E. HICKS

> We represent Precision Twist Drill & Machine, ("Precision") in the above referenced matter. Precision has forwarded to us copies of Region 5's General Notice of Potential Liability letter dated September 28, 1994, and received by Precision on October 5, 1994, and the October 6, 1994 follow-up correspondence you sent to Precision, which was received on October 10, 1994, and which contained the CCCI Site -Generator Ranking Summary Report.

> In reviewing the above referenced Report, we note that Precision is ranked number 191 out of 224 named generators, with an alleged percentage share of .0032%.

> Precision specifically denies any responsibility with respect to the Conservation Chemical Site. However, in an effort to resolve this matter as economically and expeditiously as possible, we would be interested in any information you may have pertaining to a de minimis buyout for this site. Has a de minimis buyout been offered to alleged generators at the lower end of the ranking report? If so, please provide us with

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any specifics you may have regarding a *de minimis* buyout, or in the alternative, give us the name of the liaison counsel who would be able to answer any questions we may have with respect to this matter.

In addition, we request that you provide us copies of all documents in U.S.E.P.A.'s possession reflecting, referring or relating to U.S.E.P.A.'s assertions in its October 5, 1994 letter, that Precision Twist Drill Company is a PRP at the Site. Additionally, please provide us copies of all documents upon which the Agency has based its decision to conduct the remedial actions referenced in the Agency's September 28, 1994 letter.

Your cooperation in this matter is greatly appreciated. If you have any questions, please feel free to contact the undersigned.

Yours truly

**Bruce White** 

ABW/jh

cc: Norm Margolin

JEH/PREC001

KARAU.

ATE ATD.

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